



# **COMMONWEALTH of VIRGINIA**

## **DEPARTMENT OF ENVIRONMENTAL QUALITY**

*Street address:* 629 East Main Street, Richmond, Virginia 23219

*Mailing address:* P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

### **HAZARDOUS WASTE PROGRAM OFFICE OF WASTE PERMITTING AND COMPLIANCE DIVISION OF LAND PROTECTION & REVITALIZATION**

#### **TEMPORARY EMERGENCY PERMIT**

#### **FOR STORAGE AND TREATMENT OF HAZARDOUS WASTE**

**Permit Granted to:** Joint Expeditionary Base Little Creek Fort Story  
2600 Tarawa Court, Suite 100  
Norfolk, VA 23521

**EPA Identification No.:** VAP000016374

**Permit Issuance Date:** November 21, 2011

**Permit Expiration date:** Upon completion of action described in this permit or by  
December 21, 2011, whichever occurs first.

#### **Issue by**

Department of Environmental Quality (DEQ)  
Office of Waste Permitting and Compliance  
629 East Main Street  
P.O. Box 1105  
Richmond, Virginia 23218

#### **Authority**

Commonwealth of Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60-270, promulgated under the authority of Chapter 14, Title 10.1, Code of Virginia (1950), as amended, and Title 40 Code of Federal Regulations (CFR) § 270.61, Emergency Permit.

Joint Expeditionary Base Little Creek Fort Story  
Temporary Emergency Permit to Store and Treat Hazardous Waste  
EPA Identification No. VAP000016374  
November 21, 2011

**Name and Address of Permit Applicant**

Joint Expeditionary Base Little Creek Fort Story  
2600 Tarawa Court, Suite 100  
Norfolk, VA 23521

Contact: Matt Stepien  
Phone: (757) 341-0380

**Name, Address of Generator Facility, Phone Number, and EPA ID Number**

Joint Expeditionary Base Little Creek Fort Story  
2600 Tarawa Court, Suite 100  
Norfolk, VA 23521

Contact: Matt Stepien  
Phone: (757) 341-0380

EPA ID No. VA5170022482 – The above facility is a large quantity generator (LQG) of hazardous waste.

Mailing Address:  
Naval Station Norfolk  
Attention: Crystal St. Clair-Canaii  
1510 Gilbert Street  
Norfolk, VA 23511

Contact: Crystal St. Clair-Canaii  
Phone: (757) 341-0400

**Contact Name and Phone Number**

Crystal St.Clair-Canaii, Hazardous Waste Supervisor or  
Bernadette Reese, Acting Hazardous Waste Supervisor  
Naval Station Norfolk  
1510 Gilbert Street  
Norfolk, VA 23511

Phone: (757) 341-0400, and (757) 341-0408  
Fax: (757) 341-0499

E-mail: [crystal.stclaircanai@navy.mil](mailto:crystal.stclaircanai@navy.mil) or [bernadette.reese@navy.mil](mailto:bernadette.reese@navy.mil)

Joint Expeditionary Base Little Creek Fort Story  
Temporary Emergency Permit to Store and Treat Hazardous Waste  
EPA Identification No. VAP000016374  
November 21, 2011

**Name, Location and EPA ID Number of Storage and Treatment Facility**

Joint Expeditionary Base Little Creek Fort Story  
Building 106, Abbott Road  
Norfolk, VA 23521

Emergency Storage and Emergency Treatment EPA ID No. VAP000016374

**Action Authorized**

The Joint Expeditionary Base Little Creek Fort Story (JEBLCFS), is permitted by this Temporary Emergency Permit to operate as a facility for the emergency temporary storage and emergency treatment of the hazardous waste listed below utilizing the procedures described under the heading "Treatment Procedures."

**Description of Waste:**

The hazardous waste consists of one 1-pint bottle of liquid Tetrahydrofuran (THF) with D001 and U213 waste numbers or codes.

(Note that the above container is suspected as potentially reactive with the additional hazardous waste number/code of D003, as applicable, due to the age of the container and the possible formation of peroxides and/or polymerization of the chemical materials.)

D001 – Ignitability  
D003 - Reactivity  
U213 – Tetrahydrofuran

**Location of Waste – Description and Map**

The waste is being stored at JEBLCFS, Building 106, with a physical address of Building 106, Abbott Road, Norfolk, VA 23521.

(See Attachment 1 for Site Location Map)

**Qualification of Individual(s) Performing the Treatment**

Reactivities Management Corp, 1025 Executive Blvd, Suite 101, Chesapeake, VA 23320-3650, has been contracted to manage and treat the THF.

Mr. George Walton and Mrs. Cherie Walton will be the technicians performing the treatment event.

(See Attachment 2 for Resumes of individuals performing the treatment.)

### **When Treatment Is to Occur**

The management (handling, and transportation) and treatment of the Tetrahydrofuran (THF) has been scheduled to begin at approximately from 0900 (9:00 AM) to 1200 (12:00 AM), on Tuesday, November 29, 2011.

### **Treatment Area – Description and Map**

The THF is being stored in a <90-day Hazardous Waste Accumulation Area located inside of Building 106 at the JEBLCFS.

The treatment area for the THF is a cul-de-sac located at the JEBLCFS, and in close proximity to the current storage site (Building 106).

To get from Building 106 to the treatment area, travel southwest on Abbot Road for less than one mile. Make a left onto Knox Road South and continue until reaching a cul-de-sac at the end of the road.

(See Attachment No. 1, Site Location Map, JEBLCFS Building 106 and Treatment Area.)

### **Name and Phone Number of State and Local Officials Contacted Prior to Treatment**

Department of Environmental Quality  
Richard J. Criqui, Jr., C.P.S.S.  
Environmental Engineer Senior  
629 East Main Street,  
Richmond, VA  
Phone (804) 698-4013  
E-mail: [Richard.criqui@deq.virginia.gov](mailto:Richard.criqui@deq.virginia.gov)

Department of Environmental Quality  
Tidewater Regional Office  
Milton Johnston, Waste Compliance Manager  
5636 Southern Blvd.  
Virginia Beach, VA 23462  
Phone: (757) 518-2151

Explosive Ordnance Disposal  
LT Saulomon King  
Officer in Charge  
EODMU TWO DET NORFOLK  
Phone: (757) 444-2734

Safety Manager/Explosives Safety Officer  
Mr. Denis Bradshaw  
Navy Region, Mid-Atlantic  
2600 Taraway Ct. Building 1602  
Floor 1, Room Ste 112C  
Virginia Beach, VA 23459  
Phone: (757) 462-2193

### **Evacuation Route**

See Attachment 1, Site Location Map where the hazardous waste is stored and scheduled for treatment.

### **Transportation Route and Time of Transportation: if material will be transported off-site:**

The above mentioned waste will not be transported off the JEBLCFS Facility prior to emergency treatment.

### **Storage Extension**

The THF is currently being stored in a <90-day Hazardous Waste Accumulation Area located inside of Building 106 and the permissible storage period is set to exceed its 90-day storage limit on 28 November 2011. The storage extension under this Emergency Permit will allow the hazardous waste to be stored on-site until treatment under this Emergency Permit. The facility will store the hazardous waste in accordance with all other requirements established for a <90-day Hazardous Waste Accumulation Area until the THF can be successfully treated on November 29, 2011.

### **Treatment Procedures**

Listed below are the documented and planned treatment procedures for the management, transportation, and treatment (detonation) of the Tetrahydrofuran (THF):

1. The storage area and the work area (or treatment area) are to be selected, staged, and secured by the staff from the JEBLCFS and the staff from Reactives Management Corp.
2. The THF will be placed in a bomb box, covered with a bomb blanket and fire blanket, and then moved from the Building 106 to the work area (treatment area).
3. At the work site or treatment site, the waste will be placed in a 5-gallon pail with some vermiculite for cushioning and stabilization. The 5-gallon pail will be placed in a 30-gallon drum and surrounded by vermiculite. That drum will be placed in a 55-gallon drum and surrounded by vermiculite.

4. The container of waste will be wired with 1 to 3 electric blasting caps, depending on the material condition and container size. The caps will be secured with electrical tape. Additional vermiculite may be added.
5. A loose covering may be placed on top of the drums. The covering may be a bomb blanket or the lid of a drum. Instead of a loose covering, an optional road flare may be used to provide additional flaring capability.
6. Final wiring of the shot will be performed. When the area is all clear and if a flare is used, the flare will be lit. When the area is all clear, the shot will be fired. The detonation will completely destroy the waste and any peroxides.

### **Permit Termination**

This permit may be terminated by the DEQ at any time, without process, if the determination is made that termination is appropriate to protect human health and/or the environment.

### **Permit Standards with which Compliance is Required**

Effective Immediately:

VHWMR Part III, 9 VAC 20-60-265, as adopted from 40 CFR, Part 265, Subpart Q, Chemical, Physical, and Biological Treatment, and Subpart P, Thermal Treatment, as applicable.

VHWMR Part III, 9 VAC 20-60-264, as adopted from 40 CFR, Part 264, Subpart B, General Facility Standards, Subpart C, Preparedness and Prevention, and Subpart D, Contingency Plan and Emergency Procedures, and Subpart X, Miscellaneous Units, as applicable.

VHWMR Part III, 9 VAC 20-60-270, as adopted from 40 CFR, Part 270, EPA Administered Permit Programs: The Hazardous Waste Permit Program.

VHWMR Part XII, Permit Application and Annual Fees, 9 VAC 20-60-1260, Purpose, Scope and Applicability.

All waste materials and residuals from the treatment will be managed as hazardous waste in accordance with VHWMR Part III, 9 VAC 20-60-262, as adopted from 40 CFR, Part 262, Standards Applicable to Generators of Hazardous Wastes, as applicable.

### **Reporting**

Within 30 days of permit expiration or termination, the Permittee shall submit to the Department of Environmental Quality (DEQ) a written Report detailing the times, pertinent events, sampling and analytical data, as applicable, and results of the permitted treatment activity, and any

subsequent storage, treatment, and disposal of the wastes or remaining waste residuals. Waste manifests for the shipment of the wastes or remaining treatment residuals to a permitted RCRA Treatment, Storage, or Disposal (TSD) Facility, or as applicable, the documentation associated with shipment to a RCRA Subtitle D facility, shall be included in the Report submittal. Please mail this Report to the following address:

Department of Environmental Quality  
Attn: Richard J. Criqui, Jr., C.P.S.S  
Environmental Engineer Senior  
629 East Main Street  
P.O. Box 1105  
Richmond, VA 23218

E-mail: [Richard.Criqui@deq.virginia.gov](mailto:Richard.Criqui@deq.virginia.gov)

### **Reason for Issuance**

The Department of Environmental Quality has determined that, because of the circumstances and nature of the waste, expedient action to protect human health and the environment was necessary. The waste scheduled for treatment was determined potentially unstable and treatment on site was deemed appropriate to be protective of human health and the environment.

An oral or verbal approval of the Emergency Permit for the storage, waste management, and treatment of the described hazardous waste was issued by the DEQ on November 21, 2011.

This written Emergency Permit is in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60 and 9 VAC 20-60-270, promulgated under the authority of Chapter 14, Title 10.1, Code of Virginia (1950), as amended, and Title 40 Code of Federal Regulations (CFR) § 270.61, Emergency Permits.

### **Public Comment Period**

A 30-day public comment period is provided. The public comment period is to be announced by a public notice on November 30, 2011. The DEQ solicits written comments on the issuance of the Permit until 5:00 PM, Friday, December 30, 2011. The comments must be received at the DEQ's Richmond Office address before the end of the comment period.

Written comments are to be sent to Richard Criqui, Virginia Department of Environmental Quality, 629 East Main Street, P.O. Box 1105, Richmond, Virginia 23218. (Phone: (804) 698-4013; e-mail: [richard.criqui@deq.virginia.gov](mailto:richard.criqui@deq.virginia.gov).)

A copy of the Permit may be obtained and reviewed at the above DEQ Richmond Office, and at the DEQ's Tidewater Regional Office, (Attn: Lisa Silvia), 5636 Southern Boulevard, Virginia Beach, VA 23462. (Phone No. (757) 518-2175, e-mail: [lisa.silvia@deq.virginia.gov](mailto:lisa.silvia@deq.virginia.gov)).

The DEQ will accept written comments from the public by electronic mail ([richard.criqui@deq.virginia.gov](mailto:richard.criqui@deq.virginia.gov)). All comments received by mail or e-mail must provide the commenter's name, address, and phone number, and an e-mail address should be provided, if available. Comments will not have an effect on the issuance of this Permit; however, comments will be reviewed and considered with regard to issuance of future emergency permits.

### **Emergency Occurrence**

In the event of an emergency occurrence outside the scope of this Permit, contact: Ms. Leslie A. Romanchik at (804) 698-4129, Hassan Vakili at (804) 698-4155, or Richard Criqui, at (804) 698-4013. Upon successful completion of the events authorized by this Permit, contact Richard Criqui, at (804) 698-401 or by e-mail at [richard.criqui@deq.virginia.gov](mailto:richard.criqui@deq.virginia.gov).

### **Attachments**

Attachment No. 1 – Site Location Map for JEBLCFS Building 106 & Treatment Area

Attachment No. 2 - Reactives Management Corp. Resumes for Mr. George Walton and Ms. Cherie Walton.

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Date

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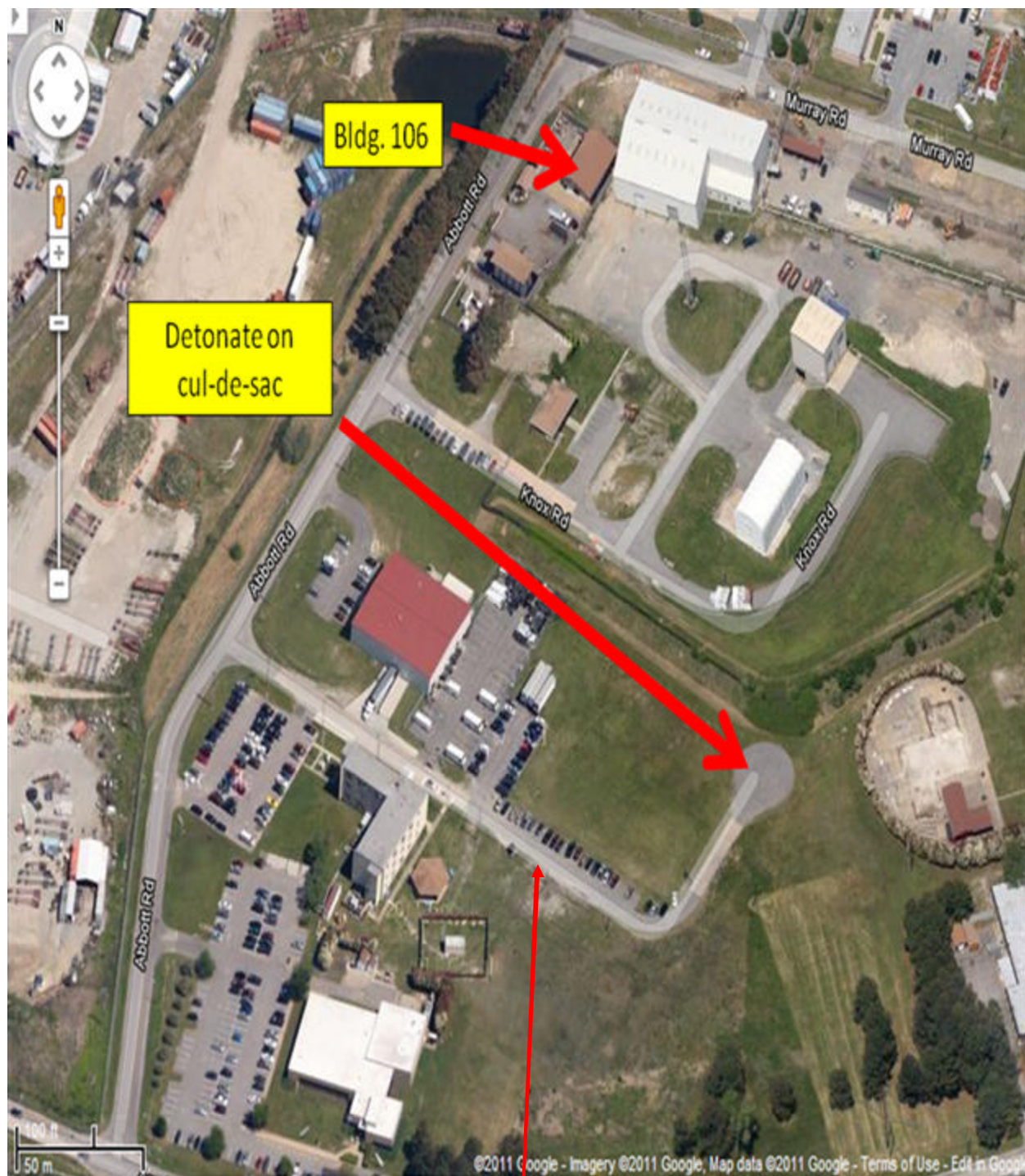
Leslie A. Romanchik  
Hazardous Waste Program Manager



Joint Expeditionary Base Little Creek Fort Story  
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## Attachment No. 1

### Site Location Map – JEBLCFS Building 106 & Treatment Area



Knox Road South

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Temporary Emergency Permit to Store and Treat Hazardous Waste  
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November 21, 2011

## Attachment No. 2

Reactive Management Corp. Resumes  
Mr. George Walton and Mrs. Cherie Walton